

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

*August Bernaerts, et al. v. Islamic Republic of Iran*, No. 1:19-cv-11865 (GBD) (SN)

**DECLARATION OF ALISON GOODMAN**  
**IN SUPPORT OF FAMILIAL RELATIONSHIP**

I, Alison Goodman, declare under penalty of perjury as provided for by 28 U.S.C. § 1746 that the following statements are true and correct:

1. My name is Alison Goodman. I submit this Declaration in support of what I understand to be Rachel Uchitel's application to be considered as the "functional equivalent" of the wife of Andrew ("Andy") O'Grady, who was killed at the World Trade Center in the terrorist attacks of September 11, 2001.

2. I live in California and work as a casting director. I have known Rachel Uchitel since her senior year in college. We met through my roommate at that time who had in turn met Rachel while on vacation at a Club Med in 1996.

3. I am a few years older than Rachel and was living and working in Manhattan when I first met her. We became fast friends very quickly. She was like a younger sister to me. At one point, when I was briefly unemployed, Rachel hired me as her assistant doing publicity for an educational website called "Homework Central."

4. In the fall of 1998, I was dating a man (named Kevin) who worked at Sandler O'Neill with Andy. Kevin and I introduced Andy and Rachel and helped set them up on their first date.

5. Andy was a very charming and wonderful person. Almost everyone who met him – including me – felt immediately at home with him, as if they were old friends.

6. Rachel and Andy fell in love quickly and deeply. They were hilarious together and great fun to be around. They took a weekend house together in Sands Point on Long Island. They also moved in together into an apartment on the Upper East side.

7. Not very long after they met, Rachel arranged a beautiful party for Andy's thirtieth birthday and made a video about him and his life for that occasion. It was then that I truly realized how happy they made each other.

8. Andy was very close with Rachel's family. They visited frequently with Rachel's mother and on several occasions they visited Rachel's grandmother in Florida.

9. I was going to be one of Rachel's bridesmaids. Then the September 11 attacks happened and Andy was killed. Instead of an engagement party, Andy and Rachel's friends and family attended Andy's memorial service. I moved in with Rachel for a few weeks after Andy was killed to try and help her cope with her loss and to continue on with her life.

10. It was a terrible time, and Rachel's loss was beyond terrible. She and Andy had made a life together, and they were already like husband and wife for all intents and purposes. Her life was forever changed by Andy's death.

11. Andy and Rachel were life partners. When Andy was killed, they were married in everything but name only. I believe that the Court should find that Rachel was the equivalent of a wife to Andy.

Executed on: 5/24/23

Name (Signature):



Name (Print): Alison Goodman